Case 1:21-cv-10719-JLR Document 16 Filed 04/22/22 Page 1 of 2



U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

April 22, 2022

BY ECF

Honorable Ronnie Abrams United States District Judge United States District Court 40 Foley Square New York, NY 10007

Re: ACLU v. FBI, 21 Civ. 10719 (RA)

Dear Judge Abrams:

In accordance with the Court's March 22, 2022, Order, ECF No. 14, we write jointly on behalf of Defendant the Federal Bureau of Investigation ("FBI") and Plaintiff the American Civil Liberties Union ("ACLU") to update the Court on the status of the parties' discussions on a schedule for the search, processing, and production of responsive records in the instant matter.

As the Parties advised in their prior status letter, the FBI has completed its search for documents potentially responsive to Plaintiff's Freedom of Information Act ("FOIA") request. Since the parties' last letter, the FBI has completed further review and is now able to provide a preliminary page count of potentially responsive records. At this time, the FBI estimates that there are approximately 1,500 pages of potentially responsive records. The FBI will review documents at a rate of approximately 500 pages per month, and will produce any responsive, non-exempt documents, or portions thereof, on a rolling basis. The FBI anticipates making its first production by May 31, 2022. Barring any unforeseen circumstances, the FBI anticipates completing its processing by the end of July.

The parties do not believe that a court conference is necessary at this time, and can provide a further status update to the Court within sixty days.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By: /s/ Dominika Tarczynska

DOMINIKA TARCZYNSKA Assistant United States Attorney

Tel. (212) 637-2748

Fax (212) 637-2686 dominika.tarczynska@usdoj.gov Attorney for Defendant

And

/s/ Nathan Freed Wessler
Nathan Freed Wessler
Laura Moraff
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
(212) 549-2500
nwessler@aclu.org

Robert Hodgson
Daphna Spivack
New York Civil Liberties Union Foundation
125 Broad Street, 19th Floor
New York, NY 10004
(212) 607-3300
rhodgson@nyclu.org

Counsel for Plaintiff